

REMARKS

Claims 1-14 remain in the application. All claims stand rejected. All rejections are respectfully traversed for the reasons set forth below. Reconsideration of the application and allowance of all claims are respectfully requested.

The present invention is directed to an arrangement whereby controllers within a control apparatus and all connected to a master controller via a common bus, communicate with one another during the course of their controlling of respective peripheral units. In accordance with the invention, each control unit sends information to the master controller regarding data consumed by or provided by the peripheral unit controlled by that control unit. A further aspect of the operation is that each control unit spontaneously sends a message to other control units whenever it detects a variation of the data provided by a peripheral unit under its control.

Regarding the Section 101 rejection in paragraph 1 of the Office action, claim 13 has been canceled. But MPEP §§2106.IV.B.1. and 2106.IV.B.1.a make it clear that a claim is in compliance with 35 USC 101 if it recites a program stored on a computer-readable medium, which is the case with claim 14. Thus, withdrawal of the Section 101 rejection of claim 14 is respectfully requested.

Turning now to the rejection stated in paragraph 2 of the Office action, Ludtke is directed to a “media manager” for controlling autonomous media devices within a network environment. A plurality of devices such as a video camera, VCR, television, set top box and computer are connected together over a common bus. According to the analysis offered by the examiner, it appears that the components such as 12 and 13 are the control units and the media manager of

Ludtke corresponds to the claimed master controller. However, claim 1 requires that the plurality of control units make up a single control apparatus. The components 12 and 13 in Ludtke are not parts of a single control apparatus. While it is believed claim 1 is already clear in this regard, it has been amended above for further clarity.

The dependent claims rejected in paragraph 2 of the Office action are allowable due to dependence on allowable claim 1. However, there are a number of features recited in these claims which are not taught by Ludtke, particularly when claim 1 is properly interpreted to be directed to a plurality of control units all contained within a control apparatus. For example, claim 2 recites that each control unit sends to a master controller information regarding the structure of messages to be used by that control unit. This is not taught by Ludtke. The examiner simply refers to language in Ludtke regarding the passing of events through the event manager, but there is nothing discussed regarding sending information regarding message structure itself. This is particularly novel in the context of a plurality of control units all part of the same control apparatus.

Claim 3 recites that each control unit has a respective address. It may well be that the different physical devices in Ludtke have respective addresses, but claim 3 is describing a bus within a single apparatus and the assigning of different addresses to different parts of a single control apparatus.

Regarding claim 6, it is not true that a time stamp is the same as a counter. A counter counts messages, while a time stamp counts time. If a message is received where the counter value is not the next sequential count value, the system can know that a message was missed, but

Amendment Under 37 C.F.R. § 1.111
USSN 10/006,583

this is not possible with a time stamp. The claim has been amended to clarify that the claimed counter is not a time counter but a message counter.

For the above reasons, it is submitted that the subject matter of claims 1-9, 11, 13 and 14 is not taught by Ludtke.

Claims 10 and 12 stand rejected as unpatentable over Ludtke in view of Zintel (USP 6,779,004). However, Zintel does not make up for the deficiencies in the teaching of Ludtke with regard to the features missing in Ludtke as discussed above. Accordingly, claims 10 and 12 are allowable due to their dependence on claim 1.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

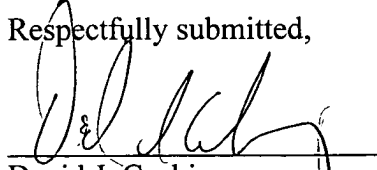
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Date: January 9, 2006